

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**PEERLESS INDEMNITY INSURANCE
COMPANY, f/k/a ATLAS ASSURANCE
COMPANY OF AMERICA**

Plaintiffs,

v.

**AXA GENERAL INSURANCE HONG
KONG LIMITED f/k/a UNION
INSURANCE SOCIETY OF HONG KONG,
as successor in interest to GUARDIAN
REINSURANCE COMPANY, ZURICH**

Defendants.

Case No: 7638 - CV - 07

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael R. Nelson, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Timothy W. Stalker
Firm Name: Nelson Levine de Luca & Horst
Address: Four Sentry Parkway, Suite 300
City/State/Zip: Blue Bell, PA 19422
Telephone/Fax: (610-862-6525; (610) 862-6501

Timothy W. Stalker is a member in good standing of the Bar of the States of Pennsylvania.

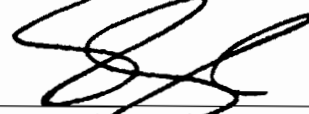
620110 #25 9-5-07 MCG

There are no pending disciplinary proceedings against Timothy W. Stalker in any State or Federal Court.

Dated:

City, State:

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MR Nelson', written over a horizontal line.

Michael R. Nelson

SDNY Bar: 609677

Nelson Levine de Luca & Horst

Four Sentry Parkway, Suite 300

Blue Bell, PA 19422

Phone: (610) 862-6560

Fax: (610) 862-6501

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**AFFIDAVIT OF
MICHAEL R. NELSON
IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
) ss:
County of New York)

Michael R. Nelson, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Nelson Levine de Luca & Horst, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Timothy W. Stalker as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of Pennsylvania, and was admitted to practice law November 24, 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Timothy W. Stalker since 2004.
4. Mr. Stalker is a Partner at Nelson Levine de Luca & Horst, in Blue Bell, Pennsylvania.

5. I have found Mr. Stalker to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Timothy W. Stalker, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Timothy W. Stalker, pro hac vice, which is attached hereto as Exhibit A.

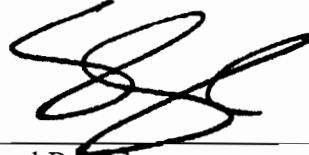
WHEREFORE it is respectfully requested that the motion to admit Timothy W. Stalker, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Date:

City, State:

Notarized:

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MR Nelson', written over a horizontal line.

Michael R. Nelson

SDNY Bar Code: 609677

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CERTIFICATE OF SERVICE

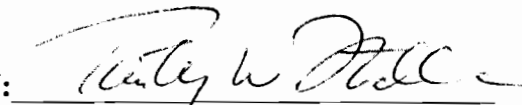
I, Timothy W. Stalker, hereby certify that a true and correct copy of the Motion for Pro Hac Vice was served on September 4, 2007, upon counsel listed below by United States Mail, postage prepaid.

AXA General Insurance Hong Kong Ltd
30/F PCCW Tower
Taikoo Place
979 King's Road
Quarry Bay
Hong Kong

Respectfully Submitted,

NELSON LEVINE de LUCA & HORST, LLC

BY:



**TIMOTHY W. STALKER
ATTORNEYS FOR PLAINTIFF
PEERLESS INDEMNITY INSURANCE
COMPANY**

Dated: September 4, 2007



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Timothy W. Stalker, Esq.

DATE OF ADMISSION

November 15, 1977

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 27, 2007


Patricia A. Johnson
Chief Clerk